Serial No.: 09/902,797
Art Unit: 3627
               Docket No. 19255.04
               Customer No. 37833

REMARKS

Upon entry of the above amendments, Claims 1-20 will be amended. Claims 1-20 are pending in the present application. Claims 1, 12, and 18 are independent claims. Applicants respectfully request reconsideration and allowance in view of the foregoing amendments and the following remarks.

Applicants' representative was unable to conduct a scheduled telephone interview with the Examiner prior to the filing date of this response, and respectfully requests the rescheduling of the telephone interview, and the withholding of action on this response until the telephone interview has been conducted.

Entry of this Amendment is proper under 37 C.F.R. 116 because the amendments: (a) place the application in condition for allowance for the reasons discussed herein; (b) do not raise any new issues that would require further consideration and/or search as the amendments and arguments presented merely amplify issues previously discussed throughout prosecution; and (c) place the application in better form for an appeal, should an appeal be necessary. The amendments are necessary and were not earlier presented as they are in response to new grounds of rejection entered in the Final Rejection. Applicants respectfully request entry of the Amendment.

Claims 1-20 are rejected under 35 U.S.C. § 112, first and second paragraphs, as allegedly failing to comply with the written description requirement and being unclear because there is allegedly no support for a computer readable program code means that

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performs a task without any server side software, installation or setup for processing of any computer instructions. The Examiner also does not understand how Applicants can state in the specification that HTTP protocol requires an HTTP server program and then claim a computer readable means without any server side software. Applicants respectfully traverse these rejections.

Applicants respectfully submit that previously presented Claims 1-20 fully satisfied the specific requirements of 35 U.S.C. § 112, first paragraph because the claimed client-side systems and programs to integrate point-of-sale and e-commerce website operations on a first computer _was_ described in the specification, as originally filed, in such a way as to enable one skilled in the client-server computer art to make and/or use the invention.

The client-side systems and programs to integrate point-of-sale and e-commerce website operations on a first computer described throughout the specification include first through sixth computer readable code means. The first code means is for constructing a relational database on the first computer, where the database has an inventory of items offered for sale. The second code means is for generating an e-commerce website on the first computer. The second code means is processed on the first computer without using any server side software, installation, or setup for processing of any computer instructions on at least one second computer. The at least one second computer is a Web server supporting Internet and Web protocols. The third code means is for uploading on-line the website to the at least one second computer. The third code means is processed on the

first computer without using any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols. The fourth code means is for maintaining the database of the inventory of items offered for sale on the website and at a point-of-sale. The fourth code means is processed on the first computer without using any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols. The fifth code means is for updating the inventory database to reflect sales made on the website and at the point-of sale. The fifth code means is processed on the first computer without using any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols. The sixth code means is for reflecting changes on the website resulting from changes in the inventory of the items available for sale. The sixth code means is processed on the first computer without using any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols.

As clearly described in the present application, a block diagram of a prior art system, such as that described by Blinn et al., is shown in Fig. 1. This prior art approach to e-Commerce includes a conventional web host and a conventional dynamic web server including a database, scripting software and a non-specialized web server. Note that because the inventory database is stored on the web server, each page is created fresh for each viewing based on inventory availability. With significant load the amount of time it

takes to download a page from the server becomes unreasonable, and potential sales are lost. Additionally, because everything is done on the web server, large quantities of disk space must be leased, at ever increasing expense. The amount of available disk space must be continuously monitored to prevent the site from becoming unusable or unstable, forcing additional technical man-hours (see pages 27-29).

Flow of the specified client-side systems and programs to integrate point-of-sale and e-commerce website operations on a first computer is shown in Fig. 2 of the present application, where an Internet platform can be created from software installed and operated locally by a merchant (storefront owner) on its own computer (now claimed as a first computer). No e-Commerce provider is needed. Nor is any HTML or computer programming needed. The store owner can rent available space from any Internet Service Provider (ISP) to provide access to the Internet and run standard Hyper Text Transport Protocol (HTTP) and File Transfer Protocol (FTP) services, not just specialized e-commerce servers.

The software enables the storefront owner to self generate a complete Internet storefront with complete e-Commerce capabilities. Without having to depend on any other server applications, write HTML, scripts or program, the merchant can format the storefront, add items, and view the store locally with full functions on its own computer.

Items to be sold at the online retail site may be photographed and can be customized and organized for easier access. The system creates descriptions and title fields for each item to be used in conjunction with an electronic retail store group search

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engine as shown in Figures 5A-6B. Items are grouped into categories similar to retail sites so that they can be searched and viewed in an organized and efficient manner. The images and information are uploaded to a web server (now claimed as at least one second computer). When each item is selected for customer viewing, the item image and information is then downloaded from the web server to the customer computer. The customer's information is stored in a cookie on the customer's computer so that it will only have to be entered once.

Without having to have a database maintained elsewhere, the merchant can integrate the inventory for point-of-sale and Internet sales from one common point-of-sale database. The database also includes sections for vendor, customer, and employee information with a built in backup, repair, and restore routines.

Support for the claimed software is provided on pages 24-25 of the present application, where it plainly described how software that runs on a server or web server is server-side software. Server-side electronic commerce software dynamically creates HTML web pages from a database located on the server in accordance with pre-formatted requests from an Internet client computer web browser received via HTTP protocol. The instant invention does not involve server-side software. Rather, this invention includes client-side, or non-server-side software. *The software runs exclusively on a client computer without dependence upon a web server for the processing of any computer instructions. HTML and non-HTML web pages are dynamically created on the client computer from a database stored on the client computer in accordance with*

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___pre-formatted rules stored on the same client computer___ (emphasis added). Created web pages and associated files are later uploaded to any web server via File Transfer (FTP) protocol as more fully described herein. The software of the inventory management system stands alone and does not require any addition online electronic commerce provider.

A typical combination of resources a merchant may have include client computers that are personal computers or workstations, and a web server that is a personal computer, a workstation, a minicomputer, and/or a mainframe. The network preferably comprises the Internet, although it could also comprise intranets, extranets, local area networks, wide area networks, etc. A computer system which is configured for use with the inventory management system preferably includes a web server, a client computer, and inventory software, which is stored in the client computer and enables the client computer. The computer system also includes a printing device electronically connected to the client computer, wherein the inventory software enables the printing device to print receipts, barcodes, and reports.

Applicants respectfully submit that one skilled in the in the client-server computer art would have fully understood the specified client-side systems and programs to integrate point-of-sale and e-commerce website operations on a first computer so as to be able to understand what was set forth in Claims 1-20. Applicants concedes that the use of the phrase "without using any server side software, installation, or setup for processing of any computer instructions" without reciting which computer the phrase applied to

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rendered the claims unclear under 35 U.S.C. § 112, second paragraph, but not in a manner sufficient to fail the written description requirement under 35 U.S.C. § 112, first paragraph.

Applicants have amended Claims 1-20 to clarify the claim language. Applicants respectfully submit that the amendments to the claims overcome these rejections, are fully supported by the original disclosure, and introduce no new matter therewith.

Amended independent Claim 1 recites a client-side system for e-commerce, which integrates point-of-sale and Internet operations. The client-side system includes a first computer having a processor, a memory coupled to the processor, and a computer readable medium coupled to the memory having computer readable program code means embodied therein. The computer readable program code means includes first through sixth code means. The first code means is for constructing a relational database on the first computer, where the database has an inventory of items offered for sale. The second code means is for generating an e-commerce website on the first computer. The second code means is processed on the first computer without using any server side software, installation, or setup for processing of any computer instructions on at least one second computer. The at least one second computer is a Web server supporting Internet and Web protocols. The third code means is for uploading on-line the website to the at least one second computer. The third code means is processed on the first computer without using any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols.

The fourth code means is for maintaining the database of the inventory of items offered for sale on the website and at a point-of-sale. The fourth code means is processed on the first computer without using any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols. The fifth code means is for updating the inventory database to reflect sales made on the website and at the point-of sale. The fifth code means is processed on the first computer without using any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols. The sixth code means is for reflecting changes on the website resulting from changes in the inventory of the items available for sale. The sixth code means is processed on the first computer for sale without using any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols.

Amended independent Claim 12 recites a system to integrate point-of-sale and e-commerce website operations on a first computer. The system has means to execute computer readable program codes and to communicate with at least one second computer, the at least one second computer being a Web server supporting Internet and Web protocols. The system includes first computer readable program code to construct and maintain an inventory database; second computer readable program code to generate an e-commerce website, the second code means being processed on the first computer without using any server side software, installation, or setup for processing of any

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computer instructions on the at least one second computer, said at least one second computer being a Web server supporting Internet and Web protocols; third computer readable program code to upload on-line said website to the at least one second computer, the third program code being processed on the first computer without using any additional server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols; fourth computer readable program code for updating inventory information in said database and on the website, the fourth program code being processed on the first computer without any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols; fifth computer readable program code for processing point-of-sale transactions, the fifth program code being processed on the first computer without any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols; sixth computer readable program code for processing e-commerce transactions, the sixth program code being processed on the first computer without any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols, resulting in the data being in the same computer readable format as the point-of-sale transactions; and seventh computer readable program code for transferring data about transactions and inventory information between said merchant computer and the Web server to synchronize the inventory database and to update the

website to reflect changes resulting from the processed transactions, the seventh program code being processed on the first computer without any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols.

Amended independent Claim 18 recites a client-side program embodied on a computer readable medium executable by a first computer. The program performs method steps for enabling an inventory management system to integrate point-of-sale and e-commerce operations on a website. The steps include creating the website on the first computer with website generation software, the website generation software being processed on the first computer without any server side software, installation, or setup for processing of any computer instructions on at least one second computer, the second computer being a Web server supporting Internet and Web protocols; transferring information between the first computer and the at least one second computer, the at least one second computer being linked to the website without any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols; querying the website for inventory information without any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols; retrieving inventory information corresponding to the query without any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols;

and integrating the inventory information from the website with inventory information maintained about point-of-sale operations without any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols.

Applicants respectfully request reconsideration and withdrawal of these rejections of Claims 1-20 under 35, U.S.C. § 112, first and second paragraphs.

Claims 1-20 are again rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Blinn et al. (U.S. Patent No. 5,897,622) in view of Junkin (U.S. Patent No. US 6,493,717 B1). Applicants respectfully traverse this rejection.

As discussed in the amendment filed August 26, 2004, Blinn et al. describes an electronic shopping and merchandising system which requires the client (merchant) to place a database module (per-configured to the client's (merchant's) database), a dynamic page generator and other web server side programs on a web enabled server (see Figs. 1, 2, and 14 of Blinn et al.). Blinn et al. also requires that the client's (merchant's) computer be a web enabled server. Claim 1 has NO requirement for the first computer to place a database module, a dynamic page generator or other web server side programs on a web enabled server or even have a web enabled server at the location of the first computer. Blinn et al. does not teach an electronic shopping and merchandising system generated on a non-web enabled server/computer.

Blinn et al. describes in column 6, line 26-28, and in Fig. 2 how the system of Blinn et al. incorporates a database module, dynamic page generator, and other web

server side programs to process customers requests and orders which must be a web enabled server. In the claimed invention, all HTML page generation can be done on the first computer when the first computer is disconnected from the Internet, and the first computer need not be a web-server. Furthermore, in the claimed invention, no database module, dynamic page generator, or other web server side programs are needed to execute the claimed software. The claimed invention has a database on the first computer, which makes for a safer location then a web enabled server.

Blinn et al. teaches a dynamic page generator that uses HTML structure (web server side) when each customer views a product/item using his/her computer browser. In the claimed invention, the product/item HTML page (static page) is generated at the first computer which is then uploaded to at least one second computer that is a web server when first added or when product/item changes are made, without the need for a dynamic page generator to run on the web server each time a customer views a product/item. As a result, the viewing time of these HTML pages is much faster than Blinn et al.

Blinn et al.'s connection from the local database to the server database module and the dynamic real-time web page generator takes time and requires that client's (merchant's) computer be a fast web enabled server and that server be up and running. In the claimed invention, the first computer need not be a web enabled server, and all HTML pages can be viewed very fast by the customer's browser without the first computer being connected to the internet. Customer's orders are received later when the first computer (merchant's computer) is reconnected to the Internet.

All processing in Blinn et al. is done by using the customer's web browser processor with standard JavaScript enabled on the customer's browser computer. – NOT with a server side database and server side processing software- see Blinn's Detailed Description Column 10 section 17 to 42 – database 121, page processor 140 and a query module 142 which is a server side relation database, dynamic page generator and a page processor that prepares a HTML page to be displayed on the Customers Browser on request. Furthermore Blinn's states in this section the database 121 is a relational database that processes queries in the SQL data sub-language; this requires that a server side SQL processing instruction be used on the server – SQL Program –).

Junkin teaches the data management of database information using a web browser and a DataCrawler for a web database application (see column 2; lines 37-67). This requires that a database be on a web-enabled server with the needed DataCrawler and other data handling programs. In the claimed invention, the entire first computer's (client's (merchant's)) data management is done locally at the first computer to upload the formatted HTML to the at least one second computer, and then later receives the ordering information. These techniques are outlined and described in the specification.

The claimed invention does not create dynamic real-time web pages at a web server (e.g. the at least one second computer), but creates static web pages on the first computer which can then be placed on any web server (e.g. the at least one second computer), so that a customer's web browser can view the page and have the embedded JavaScript process the resulting customer order on the customer's web browser.

The end user of the claimed invention may be a small business owner who can only afford to spend a few hundred dollars a year in automating his business (Point of Sale & E-Commerce). Blinn et al. alone or in combination with Junkin offers no solution for these small business owners because of high startup and monthly costs required to maintain their own web servers.

The Examiner considered the merchant system in Blinn et al. as satisfying both the claimed first and at least one second computers. This is nowhere taught or reasonably suggested by Blinn et al. Blinn et al. nowhere describes how software is used to generate a website on a first computer, be it a web server or not, and is then uploaded to at least one second computer, which is a web server, is generated without any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols, as Claims 1-20 require.

In order to establish a prima facie case of obviousness, all of the claimed limitations must be taught or suggested by the prior art, and there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or to combine the reference teachings. *In re Vaek*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

Applicants respectfully submit that Blinn et al., Junkin, or any combination thereof provides no motivation whatsoever to modify the teachings thereof to provide a client-side system for e-commerce, which integrates point-of-sale and Internet operations,

that includes a first computer having a processor, a memory coupled to the processor, and

a computer readable medium coupled to the memory having computer readable program

code means embodied therein, the computer readable program code means including first

through sixth code means; the first code means being for constructing a relational

database on the first computer, where the database has an inventory of items offered for

sale; the second code means being for generating an e-commerce website on the first

computer, the second code means being processed on the first computer without using

any server side software, installation, or setup for processing of any computer instructions

on at least one second computer, the at least one second computer is a Web server

supporting Internet and Web protocols; the third code means being for uploading on-line

the website to the at least one second computer, the third code means being processed on

the first computer without using any server side software, installation, or setup for

processing of any computer instructions on the at least one second computer other than

Internet and Web protocols; the fourth code means being for maintaining the database of

the inventory of items offered for sale on the website and at a point-of-sale, the fourth

code means being processed on the first computer without using any server side software,

installation, or setup for processing of any computer instructions on the at least one

second computer other than Internet and Web protocols; the fifth code means being for

updating the inventory database to reflect sales made on the website and at the

point-of-sale, the fifth code means being processed on the first computer without using

any server side software, installation, or setup for processing of any computer instructions

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least one second computer other than Internet and Web protocols; and the sixth code means being for reflecting changes on the website resulting from changes in the inventory of the items available for sale, the sixth code means being processed on the first computer without using any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols, as Claim 1 requires.

Applicants respectfully submit that Claim 1 is allowable for reasons given above, and request reconsideration and withdrawal of the rejection of Claim 1 under 35 U.S.C. § 103(a) as being unpatentable over Blinn et al. in view of Junkin.

Additional features of the invention recited in Claim 1 are found in dependent Claim 2.

Amended dependent claim 2 recites that the system is configured to create static ASCII text files Hyper Text Markup Language (HTML) format on the first computer and then upload the created files to the at least one second computer via the Internet standard File Transfer Protocol (FTP), transfer said static ASCII text HTML files from the at least one second computer via the Hypertext Transfer Protocol (HTTP) to an Internet customer's computer having a Web browser, and dynamically generate said e-commerce website by the Web browser from the merchant's uploaded ASCII text HTML files.

Applicants respectfully submit that Blinn et al., Junkin, or any combination thereof provides no motivation whatsoever to modify the teachings thereof to provide the features Claim 2 requires.

Applicants respectfully submit that Claim 2 is allowable for at least the same reasons given above with respect to Claim 1 and for the additional features recited therein, and request reconsideration and withdrawal of the rejection of Claim 2 under 35 U.S.C. § 103(a) as being unpatentable over Blinn et al. in view of Junkin.

Additional features of the invention recited in Claim 1 are found in dependent Claim 3.

Dependent Claim 3 recites that the system further includes the Internet customer's Web browser. The system is configured such that the fifth code means is initiated by a customer transaction relating to an item or items available for sale on the e-commerce website, thus resulting in a non-secure e-commerce order. The Internet customer's Web browser transfers information about the non-secure e-commerce order to a third party's Web server via HTTP, which then transfers the transaction via the Internet to an electronic mail server identified by the first computer using Simple Mail Transfer Protocol (SMTP).

Applicants respectfully submit that Blinn et al., Junkin, or any combination thereof provides no motivation whatsoever to modify the teachings thereof to provide the features Claim 3 requires.

Applicants respectfully submit that Claim 3 is allowable for at least the same reasons given above with respect to Claim 1 and for the additional features recited therein, and request reconsideration and withdrawal of the rejection of Claim 3 under 35 U.S.C. § 103(a) as being unpatentable over Blinn et al. in view of Junkin.

Additional features of the invention recited in Claim 1 are found in dependent Claim 4.

Dependent Claim 4 recites that the system is configured such that the sixth code means involves uploading updated pages for the website generated by the updated inventory database.

Applicants respectfully submit that Blinn et al., Junkin, or any combination thereof provides no motivation whatsoever to modify the teachings thereof to provide the features Claim 4 requires.

Applicants respectfully submit that Claim 4 is allowable for at least the same reasons given above with respect to Claim 1 and for the additional features recited therein, and request reconsideration and withdrawal of the rejection of Claim 4 under 35 U.S.C. § 103(a) as being unpatentable over Blinn et al. in view of Junkin.

Additional features of the invention recited in Claim 1 are found in dependent Claim 5.

Dependent Claim 5 recites that the system is configured such that the Internet customer's Web browser transfers information about the e-commerce order as a Non-Secure Order to a third party's web server via HTTP, which then transfers the non-secure order via the Internet to an electronic mail server using SMTP.

Applicants respectfully submit that Blinn et al., Junkin, or any combination thereof provides no motivation whatsoever to modify the teachings thereof to provide the features Claim 5 requires.

Applicants respectfully submit that Claim 5 is allowable for at least the same reasons given above with respect to Claim 1 and for the additional features recited therein, and request reconsideration and withdrawal of the rejection of Claim 5 under 35 U.S.C. § 103(a) as being unpatentable over Blinn et al. in view of Junkin.

Additional features of the invention recited in Claim 1 are found in dependent Claim 6.

Dependent Claim 6 recites that the system is configured such that the Internet customer's Web browser transfers information about the e-commerce order as a Secure Order via the Internet using Secure Hypertext Transfer Protocol (HTTPS) to transfer the information to a Third Party Secure Transaction Payment Provider, who then transmits the secure order to an electronic mail server for the first computer using SMTP.

Applicants respectfully submit that Blinn et al., Junkin, or any combination thereof provides no motivation whatsoever to modify the teachings thereof to provide the features Claim 6 requires.

Applicants respectfully submit that Claim 6 is allowable for at least the same reasons given above with respect to Claim 1 and for the additional features recited therein, and request reconsideration and withdrawal of the rejection of Claim 6 under 35 U.S.C. § 103(a) as being unpatentable over Blinn et al. in view of Junkin.

Additional features of the invention recited in Claim 1 are found in dependent Claim 7.

Dependent 7 recites that the system further includes means for tracking company expenses, vendors, customers or employees; means for generating various reports including, but not limited to, inventory detail, sales, returns, profit; means for reordering items when quantities reach predetermined levels; means for automatically calculating taxes and shipping charges; and means for processing e-commerce and point-of-sale transactions, including cash sales, returns, invoices, credit memos, and payments.

Applicants respectfully submit that Blinn et al., Junkin, or any combination thereof provides no motivation whatsoever to modify the teachings thereof to provide the features Claim 7 requires.

Applicants respectfully submit that Claim 7 is allowable for at least the same reasons given above with respect to Claim 1 and for the additional features recited therein, and request reconsideration and withdrawal of the rejection of Claim 7 under 35 U.S.C. § 103(a) as being unpatentable over Blinn et al. in view of Junkin.

Additional features of the invention recited in Claim 1 are found in dependent Claim 8.

Dependent Claim 8 recites that the system is configured such that a user of the first computer uses the system with multiple e-commerce websites or multiple points-of-sale that offer for sale items from a common inventory.

Applicants respectfully submit that Blinn et al., Junkin, or any combination thereof provides no motivation whatsoever to modify the teachings thereof to provide the features Claim 8 requires.

Applicants respectfully submit that Claim 8 is allowable for at least the same reasons given above with respect to Claim 1 and for the additional features recited therein, and request reconsideration and withdrawal of the rejection of Claim 8 under 35 U.S.C. § 103(a) as being unpatentable over Blinn et al. in view of Junkin.

Additional features of the invention recited in Claim 1 are found in dependent Claim 9.

Dependent Claim 9 recites that the system is configured such that a user of the first computer uses the system in connection with an Intranet.

Applicants respectfully submit that Blinn et al., Junkin, or any combination thereof provides no motivation whatsoever to modify the teachings thereof to provide the features Claim 9 requires.

Applicants respectfully submit that Claim 9 is allowable for at least the same reasons given above with respect to Claim 1 and for the additional features recited therein, and request reconsideration and withdrawal of the rejection of Claim 9 under 35 U.S.C. § 103(a) as being unpatentable over Blinn et al. in view of Junkin.

Additional features of the invention recited in Claim 1 are found in dependent Claim 10.

Dependent Claim 10 recites that the system further includes search engine means for enabling a customer to search the ~~merchant's~~ website.

Applicants respectfully submit that Blinn et al., Junkin, or any combination thereof provides no motivation whatsoever to modify the teachings thereof to provide the features Claim 10 requires.

Applicants respectfully submit that Claim 10 is allowable for at least the same reasons given above with respect to Claim 1 and for the additional features recited therein, and request reconsideration and withdrawal of the rejection of Claim 10 under 35 U.S.C. § 103(a) as being unpatentable over Blinn et al. in view of Junkin.

Additional features of the invention recited in Claim 1 are found in dependent Claim 11.

Dependent Claim 11 recites that the system is configured such that the search engine means provides for the indexing and searching of merchant web sites.

Applicants respectfully submit that Blinn et al., Junkin, or any combination thereof provides no motivation whatsoever to modify the teachings thereof to provide the features Claim 11 requires.

Applicants respectfully submit that Claim 11 is allowable for at least the same reasons given above with respect to Claim 1 and for the additional features recited therein, and requests reconsideration and withdrawal of the rejection of Claim 11 under 35 U.S.C. § 103(a) as being unpatentable over Blinn et al. in view of Junkin.

Amended independent Claim 12 recites a system to integrate point-of-sale and e-commerce website operations on a first computer. The system has means to execute computer readable program codes and to communicate with at least one second

computer, the at least one second computer being a Web server supporting Internet and Web protocols. The system includes first computer readable program code to construct and maintain an inventory database; second computer readable program code to generate an e-commerce website, the second code means being processed on the first computer without using any server side software, installation, or setup for processing of any computer instructions on the at least one second computer, said at least one second computer being a Web server supporting Internet and Web protocols; third computer readable program code to upload on-line said website to the at least one second computer, the third program code being processed on the first computer without using any additional server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols; fourth computer readable program code for updating inventory information in said database and on the website, the fourth program code being processed on the first computer without any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols; fifth computer readable program code for processing point-of-sale transactions, the fifth program code being processed on the first computer without any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols; sixth computer readable program code for processing e-commerce transactions, the sixth program code being processed on the first computer without any server side software, installation, or setup for

processing of any computer instructions on the at least one second computer other than

Internet and Web protocols, resulting in the data being in the same computer readable

format as the point-of-sale transactions; and seventh computer readable program code for

transferring data about transactions and inventory information between said merchant

computer and the Web server to synchronize the inventory database and to update the

website to reflect changes resulting from the processed transactions, the seventh program

code being processed on the first computer without any server side software, installation,

or setup for processing of any computer instructions on the at least one second computer

other than Internet and Web protocols.

Applicants respectfully submit that Blinn et al., Junkin, or any combination

thereof provides no motivation whatsoever to modify the teachings thereof to provide a

system to integrate point-of-sale and e-commerce website operations on a system to

integrate point-of-sale and e-commerce website operations on a first computer, the

system having means to execute computer readable program codes and to communicate

with at least one second computer, the at least one second computer being a Web server

supporting Internet and Web protocols, the system including first computer readable

program code to construct and maintain an inventory database; second computer readable

program code to generate an e-commerce website, the second code means being

processed on the first computer without using any server side software, installation, or

setup for processing of any computer instructions on the at least one second computer,

said at least one second computer being a Web server supporting Internet and Web

protocols; third computer readable program code to upload on-line said website to the at least one second computer, the third program code being processed on the first computer without using any additional server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols; fourth computer readable program code for updating inventory information in said database and on the website, the fourth program code being processed on the first computer without any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols; fifth computer readable program code for processing point-of-sale transactions, the fifth program code being processed on the first computer without any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols; sixth computer readable program code for processing e-commerce transactions, the sixth program code being processed on the first computer without any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols, resulting in the data being in the same computer readable format as the point-of-sale transactions; and seventh computer readable program code for transferring data about transactions and inventory information between said merchant computer and the Web server to synchronize the inventory database and to update the website to reflect changes resulting from the processed transactions, the seventh program code being processed on the first computer without any

server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols, as Claim 12 requires.

Applicants respectfully submit that claim 12 is allowable for reasons given above, and request reconsideration and withdrawal of the rejection of Claim 12 under 35 U.S.C. § 103(a) as being unpatentable over Blinn et al. in view of Junkin.

Additional features of the invention recited in Claim 12 are found in dependent Claim 13.

Amended dependent Claim 13 recites that the transferred transactional data and inventory information are text files created statically on the merchant computer.

Applicants respectfully submit that Blinn et al., Junkin, or any combination thereof provides no motivation whatsoever to modify the teachings thereof to provide the features Claim 13 requires.

Applicants respectfully submit that Claim 13 is allowable for at least the same reasons given above with respect to Claim 1 and for the additional features recited therein, and requests reconsideration and withdrawal of the rejection of Claim 13 under 35 U.S.C. § 103(a) as being unpatentable over Blinn et al. in view of Junkin.

Additional features of the invention recited in Claim 12 are found in dependent Claim 14.

Dependent Claim 14 recites that the system is configured such that the integration further includes transfer of data about transactions and inventory information between a

Web server for the first computer for electronic mail to the first computer via the public Internet.

Applicants respectfully submit that Blinn et al., Junkin, or any combination thereof provides no motivation whatsoever to modify the teachings thereof to provide the features Claim 14 requires.

Applicants respectfully submit that Claim 14 is allowable for at least the same reasons given above with respect to Claim 12 and for the additional features recited therein, and requests reconsideration and withdrawal of the rejection of Claim 14 under 35 U.S.C. § 103(a) as being unpatentable over Blinn et al. in view of Junkin.

Additional features of the invention recited in Claim 12 are found in dependent Claim 15.

Dependent Claim 15 recites that the integration recited in Claim 14 further includes data about transactions and inventory information being transferred from a general Internet user's computer to a secure transaction provider's computer via the public Internet, and then transferring said data and information between the secure transaction provider's computer to the electronic mail server via the public Internet.

Applicants respectfully submit that Blinn et al., Junkin, or any combination thereof provides no motivation whatsoever to modify the teachings thereof to provide the features Claim 15 requires.

Applicants respectfully submit that Claim 15 is allowable for at least the same reasons given above with respect to Claim 1 and for the additional features recited

therein, and requests reconsideration and withdrawal of the rejection of Claim 15 under

35 U.S.C. § 103(a) as being unpatentable over Blinn et al. in view of Junkin.

Additional features of the invention recited in Claim 12 are found in dependent

Claim 16.

Dependent Claim 16 recites that the system further includes eighth computer

readable program code for tracking company expenses, vendors, customers and

employees; ninth computer readable program code for generating various reports

including, but not limited to, inventory detail, sales, returns, profit; a computer readable

program code for reordering items when quantities reach predetermined levels; and tenth

computer readable program code for automatically calculating taxes and shipping

charges, wherein the fifth computer readable program code for processing point-of sale

transactions and sixth computer readable program code for processing e-commerce

transactions, includes code to process cash sales, returns, invoices, credit memos, and

other payments.

Applicants respectfully submit that Blinn et al., Junkin, or any combination

thereof provides no motivation whatsoever to modify the teachings thereof to provide the

features Claim 16 requires.

Applicants respectfully submit that Claim 16 is allowable for at least the same

reasons given above with respect to Claim 1 and for the additional features recited

therein, and requests reconsideration and withdrawal of the rejection of Claim 16 under

35 U.S.C. § 103(a) as being unpatentable over Blinn et al. in view of Junkin.

Additional features of the invention recited in Claim 12 are found in dependent Claim 17.

Dependent Claim 17 recites that the system further includes eleventh computer readable code for enabling a customer to search merchant web sites.

Applicants respectfully submit that Blinn et al., Junkin, or any combination thereof provides no motivation whatsoever to modify the teachings thereof to provide the features Claim 17 requires.

Applicants respectfully submit that Claim 17 is allowable for at least the same reasons given above with respect to Claim 12 and for the additional features recited therein, and requests reconsideration and withdrawal of the rejection of Claim 17 under 35 U.S.C. § 103(a) as being unpatentable over Blinn et al. in view of Junkin.

Amended independent Claim 18 recites a client-side program embodied on a computer readable medium executable by a first computer. The program performs method steps for enabling an inventory management system to integrate point-of-sale and e-commerce operations on a website. The steps include: creating the website on the first computer with website generation software, the website generation software being processed on the first computer without any server side software, installation, or setup for processing of any computer instructions on at least one second computer, the second computer being a Web server supporting Internet and Web protocols; transferring information between the first computer and the at least one second computer, the at least one second computer being linked to the website without any server side software,

installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols; querying the website for inventory information without any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols; retrieving inventory information corresponding to the query without any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols; and integrating the inventory information from the website with inventory information maintained about point-of-sale operations without any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols.

Applicants respectfully submit that Blinn et al., Junkin, or any combination thereof provides no motivation whatsoever to modify the teachings thereof to provide a client-side program embodied on a computer readable medium executable by a first computer, the program performing method steps for enabling an inventory management system to integrate point-of-sale and e-commerce operations on a website, the steps including: creating the website on the first computer with website generation software, the website generation software being processed on the first computer without any server side software, installation, or setup for processing of any computer instructions on at least one second computer, the second computer being a Web server supporting Internet and Web protocols; transferring information between the first computer and the at least one

second computer, the at least one second computer being linked to the website without any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols; querying the website for inventory information without any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols; retrieving inventory information corresponding to the query without any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols; and integrating the inventory information from the website with inventory information maintained about point-of-sale operations without any server side software, installation, or setup for processing of any computer instructions on the at least one second computer other than Internet and Web protocols.

Applicants respectfully request reconsideration and withdrawal of the rejection of Claim 18 under 35 U.S.C. § 103(a) as being unpatentable over Blinn et al. in view of Junkin.

Additional features of the invention recited in Claim 18 are found in dependent Claim 19.

Dependent Claim 19 recites that the program further processes point-of-sale transactions; processes e-commerce transactions, with the data in the same computer readable format as the point-of-sale transactions; and synchronizes the inventory information on the website with the point-of-sale operations.

Applicants respectfully submit that Blinn et al., Junkin, or any combination thereof provides no motivation whatsoever to modify the teachings thereof to provide the features Claim 19 requires.

Applicants respectfully submit that Claim 19 is allowable for at least the same reasons given above with respect to Claim 18 and for the additional features recited therein, and requests reconsideration and withdrawal of the rejection of Claim 19 under 35 U.S.C. § 103(a) as being unpatentable over Blinn et al. in view of Junkin.

Additional features of the invention recited in Claim 18 are found in dependent Claim 20.

Dependent Claim 20 recites that the program further tracks company expenses; generates various reports including, but not limited to, inventory detail, sales, returns, profit; and reorders items when quantities reach predetermined levels.

Applicants respectfully submit that Blinn et al., Junkin, or any combination thereof provides no motivation whatsoever to modify the teachings thereof to provide the features Claim 20 requires.

Applicants respectfully submit that Claim 20 is allowable for at least the same reasons given above with respect to Claim 1 and for the additional features recited therein, and requests reconsideration and withdrawal of the rejection of Claim 20 under 35 U.S.C. § 103(a) as being unpatentable over Blinn et al. in view of Junkin.

Applicants respectfully submit that the proposed amendments made herein properly respond to the outstanding Final Rejection and represent a *bona fide* effort to

satisfactorily conclude the prosecution of this application. Care has been exercised to insure that no new matter has been introduced and that no new issues have been raised that would require further consideration or search. It is felt that no inordinate amount of time will be required on the part of the Examiner to review and consider this amendment. In the event that the application is not allowed, it is requested that this amendment be entered for purposes of appeal.

For the foregoing reasons, Applicants respectfully submit that the present application is in condition for allowance. If such is not the case, the Examiner is requested to kindly contact the undersigned in an effort to satisfactorily conclude the prosecution of this application.

Respectfully submitted,

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